

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Wood, Douglas Serial No. 10/689,500 Filed: 10/20/2003 For: "SYSTEM AND METHOD FOR ROOT CAUSE LINKING OF TROUBLE TICKETS"	Group Art Unit: 2114 Examiner: ASSESSOR, Brian J. Confirmation Number: 4256
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REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

October 1, 2007

Sir,

Pursuant to 37 C.F.R. § 41.41, in view of the Examiner's Answer mailed on August 2, 2007, Applicant submits its Reply Brief as follows:

ARGUMENT

Reply to assertion in Examiner's Answer regarding Argument on pages 5 and 6 of Applicant's Brief

In its Appeal Brief, Applicant asserted that neither Douik nor Hiliger disclosed the element of an application in which a set of activated symptoms is presented to a user and that receives "a user incident report that includes a user-observed symptom selected by the user that corresponds to one of the set of activated symptoms." In response thereto, the Examiner's Answer asserts that Douik discloses that "a diagnosis agent first maps out possible suspects and then 'an interaction with the human repair engineer is implemented to precisely identify the error within the identified software block.'" However, assuming *arguendo* that this is a correct characterization of the cited passage in Douik, it still fails to disclose presenting activated symptoms to a user and generating a user incident report that includes one of the activated

symptoms, as recited in the independent claims of the present application.

While the position taken in the Examiner's Answer regarding Douik is inconsistent with the position advanced in the Final Office Action,¹ this citation still fails to disclose the recited elements mentioned above. The cited portion of Douik discloses:

In the diagnosis agent 28, suspect blocks are first mapped to other blocks which have their behaviors-under-test modeled. Secondly, the reasoning process is applied to the new blocks in order to produce a diagnosis of the situation. Then, in the trouble shooting assistant agent 30, an interaction with the human repair engineer is implemented to precisely identify the error within the identified software block and correct it. In this manner, the system agent interacts with the user to provide the links with tools necessary to support such engineering activities as the known faults database, browsing, and test tools. Finally, the system ensures the logging of the fault specification and the undertaken corrective actions for future utilization.
[Douk, col. 22, ll. 49-56]

Nothing in this passage discloses presenting *any* symptoms to a user, much less does it disclose generating a user incident report that includes activated symptoms.

Furthermore, the Examiner's Answer makes no attempt to relate the "suspect blocks" (or anything else) disclosed in Douik to the "symptoms" recited in the claims, as no such relation exists. The passage indicates that suspect blocks are mapped to other blocks that "have their behaviors-under-test modeled." Douik earlier mentions "faulty software blocks" [Douik, col. 22, l. 36], which leads to the conclusion that the "blocks" referred to in the passage cited in the Examiner's Answer are software blocks (*i.e.*, pieces of software code) – not activated symptoms (*i.e.*, evidence of improper functioning). There is no clear indication as to what is meant by mapping of suspect blocks to other blocks, however it appears that when a fault is detected by the system disclosed in Douik, the system identifies to the repair engineer suspected blocks of code and that the repair engineer examines these suspected blocks of code to identify an error in one of the suspected blocks of code. Nowhere is there any mention of activated symptoms

¹See, *e.g.*, Final Office Action, Page 3, second paragraph: "Douik does not explicitly disclose a system for an incident tracking application configured to present to the user a set of activated symptoms...."

being presented to the repair engineer. Therefore, contrary to the assertion in the Examiner's Answer, the cited passage in Douik completely fails to disclose or otherwise suggest either the recited element of presenting a set of activated symptoms to a user or the recited element of receiving a user incident report that includes a selected one of the activated symptoms.

Also, Applicant's Brief included arguments to the effect that the Hiliger reference failed to disclose these limitations, to which the Examiner's Answer did not respond.

Reply to assertion in Examiner's Answer regarding Argument on pages 7 and 8 of Applicant's Brief

The Examiner's Answer disagrees with Applicant's assertion in its Brief that the final Office Action "failed to demonstrate that a combination of the cited references teaches or suggests the association of a user incident report with a system incident report based on symptoms common to both reports," citing Douik, col. 15, ll. 16-31.

The cited portion of Douik discloses:

An event report handler **24** accepts observed symptoms from switching systems (alarms) and trouble reports from network users, processes *a simple form of time correlation*, and sends fault reports **25** (containing fault symptoms requiring diagnosis and repair) to a correlation agent **26**. (Emphasis added)

This portion unambiguously states that the correlation between the observed symptoms and the users' trouble reports is done through "a simple form of time correlation." There is no mention at all of associating user reports with system reports based on symptoms common to both reports, as recited in the claims. Furthermore, there is no explanation in the Examiner's Answer as to how the cited portion of Douik could be reasonably construed to indicate that the system is correlating reports based on common symptoms.

It is important to remember that in a computer system, a first occurrence of a fault can trigger a cascade of faults and that the user typically does not notice a fault until billions of cycles after the fault occurs. A simple *time* correlation between a user report of a fault and an


alarm report (as disclosed in Douik) would likely result in a correlation of a user report to a report of a cascaded fault that occurred billions of cycles after the occurrence of the original fault. The claimed invention, on the other hand, would more likely to result in the correlation of the user report with the *original* fault, thereby increasing the likelihood that the technician would be able to cure the actual source of the fault quickly. This feature is simply not disclosed in Douik, or any of the cited references.

CONCLUSION

For the reasons enumerated above, Applicant traverses the assertions made in the Examiner's Answer and requests that the outstanding rejections not be sustained and that all remaining claims be allowed.

No addition fees are believed due. However, the Commissioner is hereby authorized to charge any additional fees which may be required, including any necessary extensions of time, which are hereby requested, to Deposit Account No. 09-0461.

October 1, 2007
Date


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